

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

**GUSTAVO SANCHEZ
ANGELICA SANCHEZ
DEBTOR(S)**

§
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CASE NO. 13-31288-HCM

CHAPTER 13

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Wells Fargo Bank, N.A., as servicing agent for US Bank National Association, as Trustee for Structured Asset Securities Corporation Mortgage Loan Trust 2007-WF1 (hereinafter collectively referred to as "WF"), a secured creditor in the above-entitled and numbered case, filing this its Objection to Confirmation of Chapter 13 Plan, and in support hereof represents:

1. The above-styled Debtor(s) filed a voluntary petition under Chapter 13 of Title 11, United States Bankruptcy Code, on August 6, 2013
2. Debtor(s) is indebted to WF pursuant to a promissory note secured by a recorded instrument granting a security interest in the real property, which has the address of 13732 Paseo Las Nubes Drive, El Paso, Texas 79928 (the "Property").
3. The Property is the Debtor(s)' principal residence.
4. At the time of filing of the petition the total amount due and owing to WF was approximately \$146,284.67, with pre-petition arrearage of approximately \$21,715.28 (the "Claim").
5. Debtor(s) Chapter 13 Plan (the "Plan") as proposed provides only \$11,000.00 to satisfy the pre-petition arrearage portion of the Claim.
6. WF objects to confirmation of the Plan because:
 - a. it does not comply with Section 1322(b)(2) and is not feasible because it understates the Claim, including the pre-petition arrearages.

WHEREFORE, PREMISES CONSIDERED, WF prays that this Court deny confirmation of the Plan proposed by the Debtor(s), and grant WF such other and further relief at law and in equity as is just.

Respectfully submitted,
Buckley Madole, P.C.

/s/ Sammy Hooda
Cristina Platon Camarata / TBN 16061560
Michael J. Burns / TBN 24054447
Sammy P. Hooda / TBN 24064032
Attorneys and Counselors
9441 LBJ Freeway, Suite 250
Dallas, Texas 75243
(972) 643-6600
(972) 643-6698 (Telecopier)
E-mail: BkcyAttorneys@BuckleyMadole.com
Attorney for Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest either via pre-paid regular U.S. Mail or via electronic notification on or before the 24 day of September 2013.

Debtor's Attorney
Michael R. Nevarez
The Law Offices Of Michael R. Nevarez
P.O. Box 12247
El Paso, TX 79913

Debtor
Gustavo Sanchez
13732 Paseo Las Nubes
El Paso, Texas 79928

Debtor
Angelica Sanchez
13732 Paseo Las Nubes
El Paso, Texas 79928

U.S. Trustee
Office of the US Trustee
P. O. Box 1539
San Antonio, Texas 78295-1539

Chapter 13 Trustee
Stuart C. Cox
1760 N. Lee Trevino Dr.
El Paso, Texas 79936

City of El Paso
Linebarger Goggan Blair & Sampson, LLP
711 Navarro Ste. 300
San Antonio, Texas 78205

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/s/ Sammy Hooda
Cristina Platon Camarata
Michael J. Burns
Sammy P. Hooda